



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

OCT 20 1997

EC-2
970340

Ref: 8EPR-EP

Robert L. Storch
Forest Supervisor
Grand Mesa, Uncompahgre and Gunnison
National Forests
Sheep Flats DEIS
2250 Highway 50
Delta, CO 81416

Re: Sheep Flats Diversity
Unit, Draft Environmental
Impact Statement

Dear Mr. Storch:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Region VIII office of the Environmental Protection Agency (EPA) has reviewed the above-referenced Draft Environmental Impact Statement (DEIS). We submit the following concerns and comments for your consideration in preparation of the final Environmental Impact Statement (FEIS).

The EPA understands the proposed action is to construct roads and harvest and regenerate timber in the Sheep Flats Diversity Unit (SFDU) on the Grand Mesa National Forest, Colbran Ranger District in Mesa County, Colorado. An estimated 3,591 acres, within the 14,467 acre SFDU will be silviculturally treated through four proposed timber sales called Valley View, Leon, Grove Creek, and Sheep Flats, to produce an estimated 15.3 MMBF of timber. A variety of silvicultural prescriptions would be employed including shelterwood (1,517 acres), intermediate thinning (606 acres), group selection (846 acres), and aspen clearcuts (604 acres). To support this proposal, 8.4 miles of new road would be constructed, an additional 15.3 miles of temporary road would be required to access sales. In addition, 3.9 miles of existing road would be reconstructed and 6.1 miles of existing road would be reconditioned.

We find the discussion of Silvicultural Systems on pp. II-5 through II-8 and the further discussion on Forest Health affected environment and environmental consequences (pp. III-1 through III-26) to be most helpful in understanding impacts from implementation of the proposed action. In addition, the maps in Appendix C complement the narrative throughout the DEIS. A topographic map of the SFDU, of an appropriate scale, would be



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helpful in facilitating the Water Resources discussion on pp. III-54 and III-55 and in evaluating sediment potential.

Our primary concerns with the proposed action are related to water quality issues. While the Water Influence Zone (WIZ) is defined, per 36 CFR 219.27e, in Appendix A-Abbreviations and Glossary, and the definition implies that a one hundred foot buffer zone will be enforced along streams, water bodies and wetlands, a discussion in Ch. II related to proposed buffer zones would be helpful. Is the one hundred foot zone intended to be the buffer zone for harvesting trees, road construction and other activities for the project? If not, with the exception of road or skid trail crossings, under what circumstances would it be modified? Due to the extensive surface water resources in much of the SFDR a discussion related to how and when buffer zones would be established needs to be included in the Mitigation discussion in Ch. II and the Environmental Consequences disclosure on pp. III-56 through pp. III-59.

We understand that local intermittent roads would be closed after timber harvest, then opened as needed for future entries. We recommend the obliteration of any roadcuts to reduce the tendency of snow "prism" which can increase sedimentation during spring runoff.

Based on the procedures the EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the proposed action and alternatives in an EIS, the EPA Region VIII rates this DEIS as Category EC-2. This means that additional information, as noted, would allow us to more fully assess proposed action environmental impacts. A copy of our rating criteria is attached.

The EPA appreciates the opportunity to review and comment on the DEIS. Should you have any questions, please contact Mike Hammer of my staff at (303) 312-6563.

Sincerely,

Carol L. Campbell

Carol L. Campbell, Director
Ecosystems Protection Program

cc: Elaine Suriano, OFA EPA-HQ
Brent Truskowski, SEPR-EP